JDH.

Municipal Services

Department of Waste Management & Recycling
Paul Philleo, Director

County of Sacramento

Bradley J. Hudson, County Executive
Robert B. Leonard, Chief Deputy County Executive

June 15, 2012

James Marshall
California Regional Water
Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Subject: COMMENTS REGARDING TENTATIVE WASTE DISCHARGE REQUIREMENTS (NPDES NO. CA0083681) FOR KIEFER LANDFILL GROUNDWATER EXTRACTION AND TREATMENT PLANT

Reference: Notice Of Public Hearing dated May 11, 2012, and related documents

Dear Mr. Marshall:

Enclosed is an itemized list of comments.

Sincerely,

ERIC VANDERBILT

Eric Vanderbilt
Senior Civil Engineer

COMMENTS REGARDING TENTATIVE WASTE DISCHARGE REQUIREMENTS ORDER FOR NPDES PERMIT NO. CA0083681

Item 1 - Section VI.A.2.n of the Limitations and Discharge Requirements, Findings: Please delete this section.

REASON: This section, along with the cited Water Code section 1211, applies only to wastewater treatment plants. Wastewater treatment plants have a more stable flow pattern, generally increasing over time, which makes them more appropriate for this type of "flow protection" regulation. The Kiefer Landfill Groundwater Treatment Plant has a declining flow profile, due to declining water levels and the gradual cleanup of the groundwater and reduction in plume size. The Kiefer Landfill Groundwater Treatment Plant is already subject to a 0.18 mgd minimum flow requirement in this NPDES permit.

Item 2 - Attachment C (Flow Schematic)

Change "From Extraction Wells 1-4, 6-11, 14" with "From Extraction Wells", and change "From Extraction Wells 5, 12, 13" with "From Extraction Wells". The revised version of the flow schematic is attached.

REASON: Operation of any particular extraction well and the use of a particular treatment tower is variable, subject to changing environmental conditions. For example, the substantial reduction in influent contaminant concentrations in the past decade no longer requires both treatment towers to be operated at the same time, and it is possible to configure flows from any or all extraction wells to be routed to either tower.

Item 3 - Table E-2 of Attachment E (Monitoring and Reporting Program)

Change Minimum Sampling Frequency of Total Residual Chlorine from 1/Week or Continuous[6] to 1/Month or Continuous[6].

REASON: Chlorine is not used in the treatment system (it is only used for occasional well maintenance). Chlorine has not been detected in the effluent in the past 5 years of weekly monitoring. Continued weekly monitoring does not seem warranted.

Item 4 - Table E-2 of Attachment E (Monitoring and Reporting Program)

Change the Required Analytical Test Method for Electrical Conductivity and Turbidity from "2" to "2, 3".

REASON: Including Note 3 for these parameters allows the use of hand-held meters to conduct these measurements in the field (as opposed to laboratory analysis). DWMR prefers to measure

electrical conductivity in the field, as it is a very simple reliable measurement using equipment that rarely requires recalibration. DWMR also prefers to measure turbidity in the field, as settling of samples often occurs immediately, rendering laboratory measurement (typically conducted days later) much less accurate. Section I.C of Attachment E specifically permits onsite field measurements for turbidity.

Item 5 - Attachment E, Table E-2, Note 6

Replace:

"Continuous chlorine residual monitoring is required for a minimum of 24 hours after the discharge to Deer Creek resumes following well and groundwater treatment system maintenance system events."

With:

"Continuous chlorine residual monitoring is required for a minimum of 24 hours after the discharge to Deer Creek resumes following well and groundwater treatment system maintenance system events in which chlorine is used."

REASON: It is not necessary to monitor for chlorine following events in which chlorine is not used. Most maintenance events do not involve the use of chlorine. Only well disinfections to reduce bacterial growth involve the use of chlorine.

Item 6 - Attachment E (Monitoring and Reporting Program), Section V.D.1

Replace:

"Regular chronic toxicity monitoring results shall be reported to the Central Valley Water Board within 30 days following completion of the test, and shall contain, as a minimum:"

With:

"Regular chronic toxicity monitoring results shall be reported to the Central Valley Water Board with the monthly discharger self-monitoring reports, and shall contain, as a minimum:"

REASON: To agree with the reporting dates specified in Table E-6 for quarterly sampling frequency, and also specified in Attachment E Section X.D.1. This change does not affect the communication of adverse results to the Central Valley Water Board, which continue to be covered by the 24-hour notification requirement specified in Attachment E, Section V.C.

Item 7 - Table E-4 of Attachment E (Monitoring and Reporting Program)

Change the Required Analytical Test Method for pH, Chlorine (Total Residual), and Dissolved Oxygen from "2" to "2, 4" and add Note 4 as follows:

"4. A hand-held field meter may be used, provided the meter utilizes a USEPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility."

REASON: To be consistent with Table E-2, which permits the use of hand-held meters for these parameters

Item 8 - Table E-4 of Attachment E (Monitoring and Reporting Program)

Change the Required Analytical Test Method for Electrical Conductivity and Turbidity from "2" to "2, 4".

REASON: To be consistent with the changes proposed in Item 4. DWMR prefers to measure electrical conductivity in the field, as it is a very simple reliable measurement using equipment that rarely requires recalibration. See Item 7 for a description of Note 4.

Item 9 - Table E-5 of Attachment E (Monitoring and Reporting Program)

Change the Required Analytical Test Method for pH, Chlorine (Total Residual), and Dissolved Oxygen from "2" to "2, 7" and add Note 7 as follows:

"7. A hand-held field meter may be used, provided the meter utilizes a USEPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility."

REASON: To be consistent with Table E-2, which permits the use of hand-held meters for these parameters

Item 10 - Table E-5 of Attachment E (Monitoring and Reporting Program)

Change the Required Analytical Test Method for Electrical Conductivity and Turbidity from "2" to "2, 7".

REASON: To be consistent with the changes proposed in Item 7. DWMR prefers to measure electrical conductivity and turbidity in the field. See Item 9 for a description of Note 7.

Item 11 - Attachment F (Fact Sheet), Section IV.B.2.a.ii

Replace "There have been no significant upgrades to any of the system components since 1995." with "In 1999, the Facility was upgraded with 4 additional extraction wells and a new higher-capacity blower."

REASON: The information in the Fact Sheet was incorrect.

Item 12 - Table F-9 of Attachment F (Fact Sheet)

Change Effluent pH of "6.5 - 9.6" to "7.0 - 8.5"

REASON: To agree with Table F-2 and Section IV.C.3.d.ii(b) of Attachment F.

Item 13 - Attachment F (Fact Sheet), Section IV.F.5

Replace:

"However, due to the intermittent nature of discharges, the annual cleanout of the basin sediments, and dilution with stormwater discharges to the ponds, the TDS limitation is not expected to cause an increase in background concentrations in the groundwater."

With:

"However, due to the intermittent nature of discharges, the periodic cleanout of the basin sediments, and dilution with stormwater discharges to the ponds, the TDS limitation is not expected to cause an increase in background concentrations in the groundwater."

REASON: The sedimentation basin is not cleaned out annually. It is cleaned out periodically as deemed necessary.

Item 14 - Attachment G (Summary of RPA)

Change Column B entry for Trichloroethylene from "No Data"to "<0.18".

REASON: On February 5, 2010, a receiving water sample was taken that was nondetect for Trichloroethylene.